

EXHIBIT

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STATE OF MICHIGAN 7th Judicial District Court (P)		RR-0002221290 \$1,526.75	Original - Court 1 st copy - Defendant 2 nd copy - Plaintiff 3 rd copy - Return CASE NO. 210354-610
Court address 212 Paw Paw St, Paw Paw MI 49079		Court telephone no. (269)657-8222	
Plaintiff's name(s), address(es), and telephone no(s). Simple Home Management LLC		Defendant's name(s), address(es), and telephone no(s). Matthew Bouman 57479 Webster St Apt 2 Mattawan MI 49071 Eva Molina 1139 Lincoln Ave Lot 66 Holland MI 49423 Nicole Hepburn 867 10th St NW Apt DN Grand Rapids MI 49504 Jointly & Severally	
Plaintiff's attorney, bar no., address, and telephone no. VELO LAW OFFICE Scott A Renner (P73003) 1750 Leonard Street NE Grand Rapids MI 49505 (616) 333-0707		V	

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☒ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____, where it was given case number _____ and assigned to Judge _____.
- The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. YOU HAVE 21 DAYS after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issued 4-6-21	This summons expires 7-6-21	Court clerk <i>[Signature]</i>
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

**STATE OF MICHIGAN
IN THE 7TH JUDICIAL DISTRICT COURT (P) FOR THE COUNTY OF VAN BUREN
SIMPLE HOME MANAGEMENT LLC**

CASE NO.

Plaintiff

vs

**MATTHEW BOUMAN
EVA MOLINA
NICOLE HEPBURN**

Defendants

**VELO LAW OFFICE
Scott A Renner (P73003)
Attorney for Plaintiff
1750 Leonard Street NE
Grand Rapids MI 49505
(616) 333-0707**

COMPLAINT

THERE IS NO OTHER PENDING OR RESOLVED
CIVIL ACTION ARISING OUT OF THE
TRANSACTION OR OCCURRENCE ALLEDGE IN
THE COMPLAINT. MCR 109(D)(2)(A)(I).

NOW COMES Plaintiff, Simple Home Management LLC, by and through its attorneys, VELO LAW OFFICE, and for its Complaint, states as follows:

1. That Plaintiff, Simple Home Management LLC, is a business duly authorized to transact business.
2. That Defendant, Matthew J Bouman, is an individual whose last known address was in the City/Township/Village of Mattawan, State of Michigan. That Defendant, Eva M Molina, is an individual whose last known address was in the City/Township/Village of Holland, State of Michigan. That Defendant, Nicole M Hepburn, is an individual whose last known address was in the City/Township/Village of Grand Rapids, State of Michigan.
3. That the amount in controversy in this action is within the subject matter jurisdiction of this Honorable Court under 600.8301.
4. That venue is proper pursuant to MCL 600.1621.
5. That Plaintiff is entitled to interest pursuant to MCL 438.31, or if applicable as provided by contract, from the date the principal sum became due and attorneys fees/taxable costs.
6. Plaintiff hereby incorporates all attachments and exhibits of this complaint as though fully set forth herein.

COUNT I – BREACH OF CONTRACT

7. Plaintiff incorporates paragraphs One through Six (1-6) as though fully set forth herein.
8. Defendants entered into an agreement with Plaintiff, whereby Plaintiff was to provide housing/property management services.
9. That if the agreement was based upon a written instrument, a copy of the instrument is within the Defendants possession. (see MCR 2.113(c)(1)(b))
10. Plaintiff has completed performance by providing the agreed upon goods and/or services.

VELO LAW OFFICE

11. Defendants breached the agreement by failing to perform as promised or as required by law.
12. Plaintiff and/or Plaintiff's representatives have made numerous demands for payment, and Defendants have refused, neglected, or otherwise been unable to remedy the breach.
13. As a direct result of Defendants' breach, Plaintiff has suffered damages.
14. Plaintiff is currently owed \$1,526.75 from Matthew Bouman, \$1,526.75 from Eva Molina, and \$1,526.75 from Nicole Hepburn.

COUNT II – ACCOUNT STATED

15. In the alternative, Plaintiff incorporates paragraphs One through Fourteen (1-14) as though fully set forth herein.
16. Defendants received and accepted account billing statements from Plaintiff and/or Plaintiff's representatives.
17. Defendants have not objected to said statements.
18. That the account has become stated between the parties and consequently Plaintiff is justly owed \$1,526.75 from Matthew Bouman, \$1,526.75 from Eva Molina, and \$1,526.75 from Nicole Hepburn.

COUNT III – UNJUST ENRICHMENT

19. In the alternative, Plaintiff incorporates paragraphs One through Eighteen (1-18) as though fully set forth herein.
20. Defendants have received the benefit of housing/property management services that is/are the subject of this action.
21. The reasonable value of the benefit received and due is \$1,526.75 from Matthew Bouman, \$1,526.75 from Eva Molina, and \$1,526.75 from Nicole Hepburn.
22. That Defendants would have known their actions would cause Plaintiff damages.
23. As a result of Defendants' failure to pay, Defendants have been unjustly enriched to the detriment of Plaintiff.
24. As a result of Defendants' failure to pay, Plaintiff has sustained damages due to unjust enrichment in the amount of \$1,526.75 from Matthew Bouman, \$1,526.75 from Eva Molina, and \$1,526.75 from Nicole Hepburn.

WHEREFORE, Plaintiff, Simple Home Management LLC, respectfully request this Honorable Court enter Judgment against Defendants in the amount of \$1,526.75 from Matthew Bouman, \$1,526.75 from Eva Molina, and \$1,526.75 from Nicole Hepburn, for a **TOTAL COMPLAINT BALANCE OF \$1,526.75** (*principal of \$1,526.75 and interest of \$0.00*), together with post-filing interest, court costs, and statutory attorney fees/taxable costs.

Respectfully submitted,

Dated: March 28, 2021

/s/

VELO LAW OFFICE

Scott A Renner (P73003)
Jeffrey K VanHattum (P37969)
Bryan D Narlock (P83990)

Joshua Z Kosmerick (P80941)
Britney R Rocha (P82071)
Christopher J Sossong (P59383)

RR-0002221290
SC01-Complaint

[Michigan]

